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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

PAWS UP RANCH, LLC, a limited liability  
company with citizenship in Nevada; PAWS  
UP FOUNDATION, a non-profit corporation  
with citizenship in Delaware and Montana; and  
PAWS UP LAND COMPANY, LLC, a limited  
liability company with citizenship in Nevada,

*Plaintiffs,*

v.

CHRISTOPHER GREEN, a citizen of the  
State of Georgia; LAWTON HALL, a citizen  
of the State of Georgia; ALTIUM  
DEVELOPMENT GROUP, LLC, a limited  
liability company with citizenship in Illinois;  
ALTIUM DEVELOPMENT GROUP, LP, a  
limited partnership with citizenship in Illinois;  
GREENHALL CAPITAL, LLC, a limited  
liability company with citizenship in Georgia;  
RIVERSIDE PREMIER DEVELOPMENT,  
LLC, a limited liability company with  
citizenship in Arkansas; LION SHARE  
CAPITOL, LLC, a limited liability company  
with citizenship in Kansas; HAYMAN

Case No: 12-CV-01547-GMN-NJK

**Order Granting  
JOINT STIPULATION TO REOPEN  
DISCOVERY AS TO DEFENDANT  
CHRISTOPHER GREEN**

1 PRIVATE EQUITY, LLC, a limited liability )  
 company with citizenship in Massachusetts; )  
 2 MASTER VISION GROUP, USA, INC., a )  
 corporation with citizenship in New York; )  
 3 SOVREN MANAGEMENT, LLC, a limited )  
 liability company with citizenship in Utah; )  
 4 MOUNTAIN ATLANTIC LENDING, LLC, a )  
 limited liability company with citizenship in )  
 5 Connecticut; COHEN COMMERCIAL )  
 6 EQUITY, LLC, a limited liability company )  
 with citizenship in California; EQUITY )  
 7 FINANCIAL, LLC, a limited liability )  
 company with citizenship in Florida and New )  
 8 York; WORLDWIDE INVESTMENTS, LLC )  
 9 II, a limited liability company with citizenship )  
 in Illinois; METROPOLITAN BANCORP, )  
 10 LTD., a limited liability company with )  
 citizenship in Oklahoma; MKS, LLC, a limited )  
 11 liability company with citizenship in Florida; )  
 12 DOES 1 THROUGH 20; and ROE )  
 13 CORPORATIONS 1 THROUGH 20. )

14 COMES NOW Plaintiffs Paws up Ranch, LLC, d/b/a The Resort at Paws Up, Paws Up  
 15 Foundation, and Paws Up Land Company, LLC (collectively, "Plaintiffs"), appearing by and through  
 16 its attorneys, Airene Williamson, Esq., of the Williamson Law Office, and Leland Eugene Backus,  
 17 Esq., of Backus, Carranza and Burden, and Defendants Christopher Green, appearing by and through  
 18 his attorney of record, Michael B. Lee, Esq. of Michael E. Lee, PC, and Lawton Hall, appearing by  
 19 and through his attorneys of record, Gina Gilbert Winspear, Esq. and Matthew Sarnoski, Esq. of  
 20 Dennett Winspear, LLP, and hereby stipulate and agree as follows:

21 WHEREAS the above-referenced Counsels for the parties have met and conferred by  
 22 telephonic conference on July 13, 2015.

23 WHEREAS Discovery in this matter closed on April 11, 2014;

24 WHEREAS Defendant Christopher Green first appeared in this matter on May 11, 2015;

25 WHEREAS Plaintiffs have not been able to conduct any Discovery with Defendant  
 26 Christopher Green due to his initial appearance in this matter following service of the second amended  
 27 complaint;

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1 WHEREAS the parties agree that Discovery should be reopened as to Defendant Christopher  
2 Green;

3 WHEREAS Defendant Christopher Green wishes to pursue discovery against any cross-claims  
4 by Defendant Lawton Hall;

5 WHEREAS the parties agree that Discovery should re-open as to Defendant Lawton Hall's  
6 cross-claims against Defendant Christopher Green;

7 WHEREAS the parties agree that discovery against Defendant Lawton Hall is closed and shall  
8 remain closed on all claims, theories, and/or allegations asserted and alleged in [CD 9] Plaintiffs' First  
9 Amended Complaint;

10 WHEREAS the parties agree that [CD 227] Plaintiffs' Second Amended Complaint states new  
11 and independent causes of action against Defendant Lawton Hall beyond the already-litigated claims  
12 and allegations stated in [CD 9] Plaintiffs' First Amended Complaint;

13 WHEREAS the parties have had no opportunity to perform Discovery upon the newly stated  
14 claims against Defendant Lawton Hall asserted in [CD 227] Plaintiffs' Second Amended Complaint, as  
15 described in the foregoing paragraphs;

16 WHEREAS the parties agree that discovery should re-open regarding Plaintiffs' previously  
17 unstated claims and allegations against Defendant Lawton Hall, as described in the foregoing  
18 paragraphs.

19 THEREFORE; IT IS HEREBY STIPULATED that Discovery should be reopened as to  
20 Defendant Christopher Green.

21 IT IS FURTHER STIPULATED that Discovery should reopen as to Defendant Lawton Hall's  
22 cross-claims against Defendant Christopher Green.

23 IT IS FURTHER STIPULATED that Discovery should reopen with regard to Plaintiffs' new  
24 and independent causes of action against Defendant Lawton Hall beyond the already-litigated claims  
25 and allegations stated in [CD 9] Plaintiffs' First Amended Complaint;

26 IT IS FURTHER STIPULATED that Discovery shall remain closed on all matters not  
27 addressed herein, and shall expressly remain closed with regard to all claims, allegations, and/or  
28 causes of action asserted against Lawton Hall in [CD 9] Plaintiffs' First Amended Complaint.

1 IT IS HEREBY STIPULATED that the parties propose the following Scheduling Order  
2 Deadlines to be followed in this case:

3 A. Discovery Cut-off Date: The Discovery period shall be 180 days and the  
4 Discovery cut-off date shall be Wednesday, January 13, 2016.

5 B. Amending Pleadings and Adding Parties: All motions to amend pleadings or to  
6 add parties shall be filed no later than Thursday, October 15, 2015, which is 90 days prior to  
7 the discovery cut-off date.

8 C. Disclosures of Experts: Disclosures concerning experts, pursuant to Fed. R. Civ.  
9 P. 26(a)(2), shall be made by Friday, November 13, 2015, which is approximately 60 days  
10 prior to the discovery cut-off date.

11 D. Dispositive Motions: The date for filing dispositive motions shall not be later  
12 than Friday, February 12, 2016, which is 30 days after to the discovery cut-off date.

13 E. Pre-Trial Order: The date for filing the joint pretrial order shall not be later than  
14 Monday, March 14, 2016, which is approximately 30 days after the date for filing dispositive  
15 motions. Should dispositive motions be filed, the joint pretrial order shall be suspended a  
16 further 30 days following a decision on the last dispositive motion or as otherwise ordered by  
17 this Court. Disclosures pursuant to Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall  
18 be part of the pretrial order.

19 F. Interim Status Report: The parties shall file the interim status report required by  
20 L.R. 26-3 by Friday, November 13, 2015, which is 60 days prior to the discovery cut-off date.

21 G. Disclosures and Scope of Discovery: Plaintiffs submitted their initial disclosures  
22 on May 24, 2013; Defendant Christopher Green shall have until September 1, 2015 to submit  
23 his initial disclosures. The parties intend to conduct discovery on (1) the causes of action set  
24 forth in the Plaintiffs' Second Amended Complaint; (2) any defenses Defendant Christopher  
25 Green raises; and (3) any causes of action in the form of a cross claims brought by Defendant  
26 Lawton Hall.

27 H. Disclosure or Discovery of Electronically Stored Information. As the claims  
28 and defenses in this case may involve electronically stored information, the parties shall

1 preserve all potentially discoverable documents, including electronically-stored information.

2 I. Inadvertent Disclosure Not a Waiver. Any inadvertent disclosure or production  
3 of documents protected by the attorney-client privilege or work-product protection, or any  
4 other applicable privilege or protection, will not constitute a waiver of such available privilege  
5 or protection by the disclosing party. In the event that the receiving party discovers it has  
6 received either attorney-client privilege or work-product-protected documents, it will bring that  
7 fact to the attention of the producing party immediately upon discovery. Upon the request of  
8 the producing party, the receiving party will promptly return to the producing party any  
9 attorney-client privilege or work-product protected document and any copies that the receiving  
10 party made. Upon the request of the producing party, the receiving party will promptly disclose  
11 the names of any individuals who have read or have had access to the attorney-client privilege  
12 or work-product-protected document. No such inadvertently produced attorney-client privilege  
13 or work-product-protected document may be used in evidence against the producing party.

14 J. Protective Orders. The parties do not foresee requesting the entry of any  
15 protective orders.

16 K. Changes in Discovery. No changes should be made to the limitations on  
17 discovery imposed by Fed. R. Civ. P. 26 or 1.R. 26-1.

18 L. Orders of the Court. There are no other orders the Court should issue under Rule  
19 26(c) or under Rule 16(b) or (c).

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1 M. Settlement. In accordance with Fed. R. Civ. P. 26(f), counsel discussed  
2 settlement. At this time, settlement efforts have been unsuccessful, although the parties remain  
3 willing to continue with such dialogue.

4 DATED this 17th of July, 2015.

5 WILLIAMSON LAW OFFICE, PLLC

6  
7 /s/ Airene Williamson  
8 Airene Williamson, Esq.  
9 Nevada State Bar # 11594  
10 California State Bar # 277101  
11 *Attorney for Plaintiffs*

12 DATED this 17th of July, 2015.

13 MICHAEL B. LEE, P.C.

14 /s/ Michael B. Lee  
15 Michael B. Lee, Esq.  
16 Nevada State Bar # 10122  
17 *Attorney for Defendant Christopher Green*

18 DATED this 17th of July, 2015.

19 DENNETT WINSPEAR, LLP

20 /s/ Matthew Sarnoski  
21 Gina Gilbert Winspear, Esq.  
22 Nevada State Bar # 5552  
23 Matthew Sarnoski, Esq.  
24 Nevada State Bar # 9176  
25 *Attorneys for Defendant Lawton Hall*

26 **IT IS SO ORDERED:**

27   
28 United States Magistrate Judge

DATED: July 20, 2015